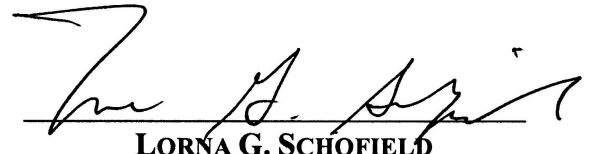


**HAYNES BOONE**



**LORNA G. SCHOFIELD**

**UNITED STATES DISTRICT JUDGE**

January 25, 2022

*Via ECF*

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application granted in part. Defendant's deadline to answer or otherwise respond to the complaint is extended to February 18, 2022. The initial pretrial conference scheduled for February 16, 2022, is adjourned to March 2, 2022, at 4:00 P.M. The deadline to file the joint letter and the proposed case management plan is extended to February 23, 2022, at noon. No further extensions will be granted absent extraordinary circumstances.

***Re: Contreras v. Cavaliers Operating Company, LLC Case No. 1:21-cv-09438-LGS***

Dear Judge Schofield:

**Dated: January 28, 2022  
New York, New York**

We are counsel to Defendant Cavaliers Operating Company, in the above-captioned action. We write pursuant to Rule I(B)(2) of Your Honor's Individual Practices to respectfully request an extension of Defendant's time to respond to the Complaint (Doc. No. 1), filed by Plaintiff Yensy Contreras, from January 28, 2022 to and including February 18, 2022.

The requested extension is necessary to enable the parties to continue active settlement discussions. This is Defendant's second request for the relief sought and it will affect the initial pretrial conference and submission of the Civil Case Management Plan currently scheduled for February 9, 2022 and February 16, 2022, respectively. We request an equal adjournment of these dates to March 2, 2022 and March 9, 2022, respectively. Plaintiff's counsel consents to the request.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Jason Habinsky*

Jason Habinsky

cc: Counsel of record (via ECF)